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October 6, 2006

Dr. Henry L. Johnson Assistant Secretary for Elementary and Secondary Education U.S. Department of Education 400 Maryland Avenue, S.W. Washington, D.C. 20202-6200

Dear Assistant Secretary Johnson:

Enclosed is Montana's revised plan to achieve the goal that all teachers of core academic subjects in Montana's public elementary and secondary schools will be Highly Qualified Teachers (HQT), as defined in the No Child Left Behind Act (NCLB), and to ensure that poor and minority children are not taught at higher rates than other children by inexperienced, unqualified, or out-of-field teachers. As you know, the plan that we submitted July 7, 2006, was determined in your peer review process to fully or partially meet all but one of the peer review "requirements."

Our revisions respond to each of the requirements or sub-elements of the requirements that were not fully met, in light of the supporting narrative provided by the peer reviewers. Specifically—

- We have amended Requirement 2 of our plan to include a narrative description identifying LEAs that have not met annual measurable objectives (AMOs) for HQT; to clarify that all LEAs have the same AMO 100% -- and to describe the steps that are expected of all LEAs that do not meet this AMO, effective immediately.
- We have amended Requirement 4 of our plan to provide that the Office of Public Instruction will work with LEAs to ensure that high quality professional development is provided to all teachers who do not meet the HQT definition and that we will collect data on this issue and monitor implementation of the policy in all high-poverty districts and schools and all districts and schools that do not make adequate yearly progress (AYP). We are communicating these policies and procedures to all LEAs in the state.
- We have not changed our basic approach to Requirement 5, concerning the HOUSSE process, but have indicated that we are evaluating that process to ensure that it is sufficiently rigorous, on a par with the level of content knowledge expectations for new teachers.
- Although we do not have inequities in HQT and out-of-field teachers, and we expect that is also the case for inexperienced teachers, we have amended our equity plan to address the issue of equitable distribution of inexperienced teachers, including defining "inexperienced teachers"; providing for the collection of information on inexperienced teachers in high-need schools and for monitoring this issue in these schools; adding

specific strategies to address this goal; and explaining the basis for our determination as to the probable success of these strategies.

I should note that the enclosed September 28, 2006 letter to me from Bob Stonehill, responding to our previous request for guidance, was very helpful to us in preparing this revised plan.

We trust that, with these revisions, you can proceed to fully approve our plan. In the event you, your staff, or the peer reviewers have any continuing concerns, we would request an opportunity to address them informally before any formal determination is made. Thank you.

Sincerely,

Linda McCulloch State Superintendent

Enclosure



Montana's Revised Plan

For Meeting the Highly Qualified Teacher Goal

Presented to the U.S. Department of Education Office of Elementary and Secondary Education Assistant Secretary Henry Johnson

by

Montana State Superintendent Linda McCulloch

July 7, 2006 Revised October 6, 2006

MONTANA REVISED PLAN FOR HIGHLY QUALIFIED TEACHERS

Requirement 1: The revised plan must provide a detailed analysis of the core academic subject classes in the State that are currently *not* being taught by highly qualified teachers. The analysis must, in particular, address schools that are not making adequate yearly progress and whether or not these schools have more acute needs than do other schools in attracting highly qualified teachers. The analysis must also identify the districts and schools around the State where significant numbers of teachers do not meet HQT standards, and examine whether or not there are particular hard-to-staff courses frequently taught by non-highly qualified teachers.

Data Collection Analysis

Current Implementation Strategies

The Office of Public Instruction (OPI) collects and analyzes teacher quality data through its Annual Data Collection (ADC). These data are collected from all Montana accredited schools and districts (LEAs). To determine which core academic subject classes are not being taught by Highly Qualified Teachers (HQT), the OPI analyzes teacher related data included in the ADC and other HQT related data collected by OPI: Educator Licensure, Adequate Yearly Progress (AYP), free and reduced lunch, and professional development records. (ADC,opi.mt.gov/ADC/Index.html; Educator Licensure Web page, opi.mt.gov/Cert/Index.html; AYP data.opi.mt.gov/WebReportCard/AYPStatus; Free and Reduced Lunch, opi.mt.gov/measurement/Index/html; and Professional Development records, opi.mt.gov/Cert/Index.html)

Montana collects data regarding core academic subject classes in the state that are currently <u>not</u> being taught by teachers meeting the HQT definition in specific subject areas. These data are analyzed with reference to the adequate yearly progress status of schools and districts where these classes are located. In addition the data identify the districts and schools in Montana where teachers are mis-assigned (not endorsed in the subject area they are teaching), and whether or not courses are particularly hard-to-staff. In all cases data collection and analysis are based on the Montana definition of highly qualified teachers as approved by the United States Department of Education (USED) in letters of April 4, 2006, and June 6, 2006.

Analysis of Montana's High Quality Teachers Teaching Core Academic Classes

Virtually all of Montana's classes in core academic subjects are taught by highly qualified teachers, consistent with the No Child Left Behind Act of 2001 (NCLB). Only 1 percent of Montana's core academic classes are taught by teachers who do not meet the HQT definition. Montana is committed to reach its goal of 100 percent of core academic classes taught by HQTs for the 2006-07 school year.

Montana Classes in Core Academic Subjects Taught by Highly Qualified Teachers for School Year 2004-05

Core academic subjects are English, reading, language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography

Teacher Qualifications	Total Classes	% Total Classes	Classes in High	% Classes in High	Classes in Low Poverty	% Classes in Low Poverty
			Poverty Schools	Poverty Schools	Schools	Schools
Highly Qualified	27,850	99%	4,089	98%	7,668	99.1%
Not Highly Qualified	297	1%	75	2%	72	0.9%
Total	28,147	100%	4,164	100%	7,740	100%

Data regarding HQT for the 2005-06 school year are not available at this time. Accordingly, all the tables in this plan that report HQT data are for the 2004-05 school year. Ordinarily, the 2005-06 data would not be issued until next fall in connection with reporting under Title II of the Higher Education Act. However, the OPI is prepared to expedite preparation, review, and release of these data to the USED in August if they are needed. We note also that the USED approved a new Montana multiple measures test for new elementary school teachers to take effect July 1, 2006. The OPI and the postsecondary Montana Council of Deans of Education will strictly apply that definition as a condition for recommending an elementary teacher candidate for licensure. Accordingly, we do not expect that application of our definition will result in an increase in non-HQTs assigned to core academic subject classes. However, we will continue to monitor our districts to ensure that this does not happen.

Analysis of AYP Status and HQT

The data indicate that even in districts that are not making adequate yearly progress, we are approaching our goal of having all teachers of core academic subjects meet the HQT definition. When comparing the data between districts that do not make AYP and statewide data, the percentages of classes in core academic subjects taught by non-HQTs, as shown in the following table, are both about 1 percent.

Analysis of School Year 2004-05 AYP Status and HQT - Districts

MT Total Core Academic Classes in	% Total Core Academic Classes	Total Classes in Districts not	% Classes in Districts not
Districts not making	for all Districts in	making AYP	making AYP
AYP	MT not making	Taught by Non- HOT	Taught by Non- HOT
1,939	7%	22	1%

These data show that there is no difference in the percentage of core academic classes taught by teachers who do not meet the HQT definition in districts that do not make AYP and the percentage of such classes in districts throughout the state.

Analysis of School Year 2004-05 AYP Status and HQT – High Schools

MT Total Core Academic Classes in	% Total Core Academic Classes	Total Classes in High Schools not	% Classes in High Schools not
High Schools not making AYP	for all High Schools in MT not	making AYP Taught by Non-	making AYP Taught by Non-
8	making AYP	HQT	HQT
756	6%	18	2%

Analysis of School Year 2004-05 AYP Status and HQT – Elementary and Middle Schools

MT Total Core	% Total Core	Total Classes in	% Classes in
Academic Classes in	Academic Classes	Elementary/Middle	Elementary/Middle
Elementary/Middle	for all	Schools not making	Schools not making
Schools not making	Elementary/Middle	AYP Taught by	AYP Taught by
AYP	Schools in MT not	Non-HQT	Non-HQT
	making AYP		
942	6%	3	0.3%

The high schools' data show that the percentage of core academic classes in high schools not making AYP taught by teachers not meeting the HQT definition is one percentage point greater than the percentage of non-HQT in such classes in high schools throughout the state. The elementary/middle schools' data show that the percentage of core academic classes in elementary/middle schools not making AYP taught by teachers not meeting the HQT definitions is 0.3 percentage less than the percentage in such classes in elementary/middle schools throughout the state. In summary, almost all Montana teachers of core academic subjects meet the HQT definition in each of these categories of schools.

Analysis of HQT and Hard-to-Staff Subjects

The following table shows the percentages of teachers who do not meet the HQT definition, disaggregated by subject taught. This table addresses the extent to which hard-to-staff courses are disproportionately taught by teachers who do not meet the HQT definition.

Analysis of HQT and Hard-to-Staff Subjects for School Year 2004-05

Subject	Total FTE	Total HQT FTE	Not HQT FTE	Percentage not HQT
Elementary	3,595.135	3,580.635	14.500	0.403%
Arts	493.116	487.133	5.983	1.213%
Special Education	697.873	686.854	11.019	1.579%
English	413.546	408.432	5.114	1.237%
Math	356.113	353.883	2.230	0.626%
Science	304.398	298.927	5.471	1.797%
Social Studies	273.118	269.390	3.728	1.365%
World Language	131.743	127.816	3.927	2.981%
TOTAL	6,265.042	6,213.070	51.972	0.830%

(Appendix A includes a list of all schools and districts with teachers of core academic subjects who are not highly qualified under NCLB, disaggregated by schools and districts that did or did not make AYP and by the class subject.)

Although there is no significant difference in the percentages of teachers who do not meet the HQT definition between schools and districts that do not make AYP and those that do make AYP, OPI will continue to monitor this issue on a continuing basis and will give priority in its monitoring, technical assistance, and professional development efforts to schools and districts with non-HQT teachers that did not make AYP. Similarly, priority in these efforts will be given to teachers of world languages, science, and special education. These efforts are spelled out in the balance of this plan.

Requirement 2: The revised plan must provide information on HQT status in each LEA and the steps the SEA will take to ensure that each LEA has plans in place to assist teachers who are not highly qualified to attain HQT status as quickly as possible.

Montana is committed to ensuring that all students are taught by highly qualified teachers. The OPI continues to implement strategies to help all schools and districts meet this obligation. Appendix A provides information on each LEA and school with teachers who do not meet the HQT requirement. A review of the data shows that the percentages of non-HQT in each school are very low, except in the smallest schools, where a single non-HQT may represent a significant percentage of the teaching staff. Also, the data show that this is overwhelmingly an issue for our most rural districts and schools. Of 55 high schools that have one or more non-HQTs, 30 have a total of less than 10 FTE teachers of core academic subjects, and 10 have a total of between 10 and 15 FTE teachers in core academic subjects. Similarly, of 68 elementary and middle schools that have one or more non-HQTs, 49 have a total of less than 10 FTE teachers of core academic subjects, and 12 have a total of between 10 and 15 FTE teachers in core academic subjects. Thus, 82 percent of our schools with any teachers who do not meet the definition of highly qualified have fewer than 15 FTE teachers.

The annual measurable objective (AMO) for each of these districts and schools is 100% HQT, effective now. As more specifically described below, each LEA that does not meet this AMO, effective now, must develop a plan to meet the AMO, and OPI works with each district, providing technical assistance in developing and implementing the plan, and monitoring its implementation. Each LEA's plan delineates the specific steps to be taken by that LEA, consistent with its needs. LEAs have the opportunity to select among the programs and technical assistant activities described under this requirement and requirement 3 in devising and implementing their plans. OPI is issuing guidance to its LEAs on the steps they must take in devising their plan, including reviewing data to determine in which schools and subjects they fall short of the AMO; analyzing available strategies and their probable success in meeting the AMO; and addressing the programs described under this requirement and requirement 3.

Technical Assistance Strategies

The OPI will:

- Identify districts not making progress toward meeting the annual measurable objective for highly qualified teachers (100 percent);
- Require these identified districts to develop an improvement plan that will enable the
 districts to meet the annual measurable objective for HQT and address the issues that
 prevented the districts from reaching the goal of 100 percent HQT;
- Provide technical assistance to the identified districts and schools within the districts during the development of the improvement plan and throughout implementation of the plan; and
- Monitor the progress of the identified districts progress toward reaching the 100 percent HQT goal for the school year 2006-07 school year and beyond.

In addition, here are three strategies we use to assist schools and districts with their HQT improvement plans.

- 1. HQT Status in each LEA Through the Annual Data Collection, all Montana schools and districts report teacher qualifications, class schedules and hours of instruction. These data verify licensure and endorsement to determine HQT status of the teachers and which core academic subject classes are taught by teachers not meeting the HQT definition.
- 2. Improvement Plans Pursuant to Administrative Rules of Montana (ARM) 10.55.605 Accreditation Categories, the Board of Public Education (BPE) is authorized to determine the accreditation status of all Montana public schools. Accreditation status consists of four ratings: Regular, Regular with Deviations, Advice, and Deficiency. When a district employs a teacher who does not meet the HQT definition, upon recommendation of the state superintendent, the BPE declares the school in Advice or Deficiency status. Schools and districts are required to submit to the OPI an improvement plan providing a step-by-step outline of what strategies will be implemented to correct the accreditation deviation to reach the 100 percent HQT definition. The OPI provides technical assistance to schools and districts and monitors their progress. (ARM 10.55.605 Accreditation Categories See Appendix B or online at www.opi.mt.gov/ARM/Index.html/Chapter55)
- 3. Hard-to-Fill Positions Pursuant to the BPE policy, teaching internships are created to meet the needs of schools and districts experiencing hard-to-fill positions, unexpected openings, or no applicants. The teaching internship program is a three-party arrangement among the teacher, district and an accredited teacher education program. If a district is unable to fill a position, the district is permitted to assign a teacher on staff to teach an out-of-field core academic subject class, on the condition that the teacher enroll in a Montana institution of higher education's accredited teacher education program in that subject area. (Professional Educator Preparation Program Standards, http://opi.mt.gov/ARM/Index.html Chapter 58). The intern is given a three-year time line to complete the course work necessary for an additional endorsement and to meet the HQT definition through the Montana high objective uniform state standards of evaluation (HOUSSE). While teaching in the program, the intern is supervised by the school principal and an HQT in that core academic subject. The OPI provides guidance and technical assistance to the teachers, district personnel and higher education faculty during the three-year internship.
- 4. Discover Montana Classrooms The OPI created and maintains an easily accessible Web page, Discover Montana Classrooms. This Web page provides services for schools and districts, e.g., posting the school's job openings, searching the applicant pool, and viewing educators' credentials. This Web page is an effective and efficient means for schools and districts to hire HQTs for all core academic subjects. In addition, Discover Montana Classrooms provides services for educators seeking teaching positions, including job listings, educator licensure requirements, applications for employment, plus other services. Discover Montana Classrooms is located at the OPI Web site at opi.mt.gov/jobs.

Strategies to Increase to 100 Percent the Number of HQT in all LEAs

- 1. School Support Teams The OPI is committed to the academic success of all students, and it is the state superintendent's goal to provide technical assistance to all schools in the pursuit of student achievement. As a beginning step toward reaching this goal, the OPI is giving high priority for technical assistance to schools and districts not making AYP and not meeting the HQT goals.
 - This spring the OPI launched the School Support Team (SST) program to assist schools identified for corrective action and restructuring. Through comprehensive on-site reviews based on the Correlates and Indicators of Effective Schools Research, the SSTs evaluate schools and districts using a scholastic review of the learning environment, organizational efficiency and academic performance. The review findings are used to determine the type and level of technical assistance necessary to continuously improve student academic performance, including strategies to reach the 100 percent HQT goal. The OPI SSTs provide follow-up support during the implementation of the strategic plan to reach the schools' and districts' identified goals, including the 100 percent HQT goal.
- 2. Improve HQT Data Collection and Analysis The OPI will continue to collaborate with Montana education associations, school district boards of trustees, administrators, and teachers, tribal education organizations, and other professional development service providers to refine the HQT data collection and analysis process to help meet the 100 percent HQT goal.
- 3. Regional Professional Development Outreach –Through the utilization of regional education cooperatives and consortia, the OPI ensures that content specific professional development is available to teachers not meeting the HQT definition. In particular, OPI will give priority to those schools that did not make AYP and have not met the 100 percent HQT goal. Priority will also be given to core academic subjects with the highest percentage of teachers not meeting the HQT definition; namely, science, special education and world languages. The OPI will broker professional development offerings in these areas.
- 4. Mentorship The OPI cosponsors, with some of its education partners, an annual mentorship institute to provide support to beginning teachers and provide job-embedded professional development opportunities to help the participating districts and schools reach the 100 percent HQT goal. Such mentorship programs fulfill a two-fold purpose: creating a culture in schools for new teachers that promotes effective teaching and learning and continuous professional growth; and taking teachers who do not meet the HQT definition and making them HQT through HOUSSE.

Requirement 3: The revised plan must include information on the technical assistance, programs, and services that the SEA will offer to assist LEAs in successfully completing their HQT plans, particularly where large groups of teachers are not highly qualified, and the resources the LEAs will use to meet their HQT goals.

Although Montana does not have large groups of teachers identified as not meeting the HQT definition, the OPI is committed to ensure that 100 percent of all teachers meet this goal for the 2006-07 school year and beyond. Technical assistance to districts is vital to successfully reach and maintain this goal. Following is a summary of the general implementation and, technical assistance, strategies used by the OPI to accomplish our HQT goal.

Current Implementation Strategies in General

- School Support Teams The OPI is committed to the academic success of all students, and it is the state superintendent's goal to provide technical assistance to all schools in the pursuit of student achievement. As a beginning step toward reaching this goal, the OPI is giving high priority for technical assistance to schools and districts not making AYP and not meeting the HQT goal.
 - This spring the OPI launched the School Support Team (SST) program to assist schools identified for corrective action and restructuring. Through comprehensive on-site reviews based on the Correlates and Indicators of Effective Schools Research, the SSTs evaluate schools and districts using a scholastic review of the learning environment, organizational efficiency, and the academic performance. The review findings are used to determine the type and level of technical assistance necessary to continuously improve student academic performance, including strategies to reach the 100 percent HQT goal. The OPI SSTs provide follow-up support during the implementation of the strategic plan to reach the schools' and districts' identified goals, including the 100 percent HQT goal.
- Regional Professional Development Infrastructure Montana is a geographically large rural state with a sparse population (147,046 square miles and 145,416 students, K-12). To systematically and consistently deliver high quality professional development in core academic subjects, the OPI supports the expansion of a statewide professional development infrastructure, including brokering the services of postsecondary institutions and regional education cooperatives/consortia to provide content rich professional development in all core academic subjects, with particular priority given to hard-to-staff subjects, i.e., science, special education, and world languages. Supported with federal funding through ESEA Title I, IDEA, and ESEA Title II, Parts A and B, regional education cooperatives and consortia deliver high quality professional development in core academic subject content. These professional development offerings are based on needs assessments, student achievement data, and the HQT and AYP status of schools and districts. High priority is given to schools and districts that make neither AYP nor the HQT goals.

- Teaching Internships Pursuant to the BPE policy, teaching internships are created to meet the needs of districts experiencing hard-to-fill positions, unexpected openings, or no applicants. The teaching internship program is a three-party arrangement among the teacher, district and an accredited teacher education program. If a district is unable to fill a position, the district is permitted to assign a teacher on staff to teach an out-of-field core academic subject class, on the condition that the teacher enroll in a Montana institution of higher education's accredited teacher education program in that subject area. (Professional Educator Preparation Program Standards, http://opi.mt.gov/ARM/Index.html) The intern is given a three-year time line to complete the course work necessary for an additional endorsement and to meet the HQT definition through the Montana HOUSSE. While teaching in the program, the intern is supervised by the school principal and an HQT in the specific core academic subject. The OPI provides guidance and technical assistance to the teachers, district personnel and higher education faculty during the three-year internship.
- Online Professional Development Opportunities Montana's Postsecondary Institutions provide online core academic subject courses appropriate for all teachers to deepen their content knowledge and teaching skills. In addition, these online core academic subject courses provide an avenue to teachers who do not meet the HQT requirements to complete the necessary course work to reach the HQT goal utilizing the Montana HOUSSE.

Technical Assistance Strategies

The OPI will:

- Provide information and outreach to the Montana Association of School Superintendents (MASS) regarding the of 100 percent HQT goal of all teachers of core academic subjects, in all LEAs;
- Provide information and outreach to other professional education organizations regarding the HQT requirements;
- Develop and disseminate online material and provide "tech talks" for teachers who currently do not meet the HQT definition;
- Analyze ADC data and monitor progress of schools and districts in their progress to meeting the HQT 100 percent goal for the 2006-07 and beyond;
- Continue to promote and scale-up regional delivery of high quality content rich professional development;
- Expand and promote a regionalized plan for districts to share the services of properly licensed and endorsed teachers for schools with hard-to-fill positions in core academic subjects. The OPI is working with the Montana Association of School Superintendents, MEA-MFT, School Administrators of Montana, Montana School Boards Association, and Tribal Education Departments and Councils to expand a regional system to equitably

- distribute HQT to teach in core academic subjects. Regional HQT "circuit riders" will be able to teach core academic subject classes in two or more school districts; and
- Continue to build partnerships with schools of education and discipline (science, mathematics, and engineering) faculty to provide core academic subject courses, professional development and technical assistance to reach the HQT goal for all LEAs.

Requirement 4: The revised plan must describe how the SEA will work with LEAs that fail to reach the 100 percent HQT goal by the end of the 2006-07 school year.

The OPI will use the following strategies to work with LEAs that fail to reach the 100 percent HOT goal by the end of the 2006-07 school year.

Current Implementation Strategies

- 1. Districts failing to meet the 100 percent HQT goal are required to submit an improvement plan outlining how the district and each school not meeting HQT within the district will meet the 100 percent HQT goal for the 2006-07 school year.
 - The OPI will provide technical assistance to the district and the schools within the
 district. The technical assistance will be provided to the district during the
 development of the improvement plan and throughout its implementation. Priority
 will be given to schools and districts not making AYP and not meeting the 100
 percent HQT goal.
 - If a district still does not make progress toward the 100 percent HQT goal, the OPI will develop, with the teachers and administrators of the district, professional development strategies and activities. These strategies and activities based on scientifically based research will be used by the district to increase student achievement and to meet the 100 percent HQT goal.
- 2. Priority will be given to schools and districts that fail to make AYP and that do not meet the HQT goal. In particular, the OPI provides support to high risk schools and districts and those in need of improvement or restructuring. The OPI establishes School Support Teams to conduct regular on-site visits to monitor and assist schools and districts to set and implement strategies to locate, hire and orient highly qualified teachers to their school.
- 3. The OPI will identify and broker arrangements with partner schools to work collaboratively with those schools having difficulty finding applicants to fill hard-to-staff core academic subjects. Several rural districts may arrange to employ a teacher or "circuit rider" who meets the HQT definition to teach core academic subject.

Additional Technical Assistance Strategies

1. Identify the schools and districts with the lowest percent of HQTs and provide direct technical assistance to them. In coordination with the Montana School Boards Association, Montana Small Schools Alliance, School Administrators of Montana, Montana Advisory Council for Indian Education, Montana Rural Education Association, Montana Council of Deans of Education, MEA-MFT and other professional education associations, develop strategies to encourage Montana teacher preparation program unit graduates to teach in Montana.

- 2. Using the Montana videoconferencing systems (METNET/Vision Net) and the regularly scheduled ADC training, the Office of Public Instruction will work with all districts at the beginning of the 2006-07 school year to determine the districts in most need of assistance. The OPI will communicate with administrators, local boards of trustees, professional education organizations, and postsecondary education to plan for 100 percent HQT goal for the 2006-07 school year.
- 3. School Support Teams The OPI is committed to the academic success of all students, and it is the state superintendent's goal to provide technical assistance to all schools in the pursuit of student achievement. As a beginning step toward reaching this goal, the OPI is giving high priority for technical assistance to schools and districts not making AYP and not meeting the HQT goal.
 - This spring the OPI launched the School Support Team (SST) program to assist schools identified for corrective action and restructuring. Through comprehensive on-site reviews based on the Correlates and Indicators of Effective Schools Research, the SSTs evaluate schools and districts using a scholastic review of the learning environment, organizational efficiency, and the academic performance. The review findings are used to determine the type and level of technical assistance necessary to continuously improve student academic performance, including strategies to reach the 100 percent HQT goal. The OPI SSTs provide follow-up support during the implementation of the strategic plan to reach the schools' and districts' identified goals, including the 100 percent HQT goal.
- 4. Professional Development AMO The Office of Public Instruction will work with LEAs to ensure that high qualify professional development is provided to all teachers who do not meet the HQT definition. OPI will collect data on this issue and monitor implementation of the policy in all high-poverty districts and schools and in all districts and schools that do not make AYP. We are communicating these policies and procedures to all LEAs in the state.

Requirement 5: The revised plan must explain how and when the SEA will complete the HOUSSE process for teachers not new to the profession who were hired prior to the end of the 2005-06 school year, and how the SEA will limit the use of HOUSSE procedures for teachers hired after the end of the 2005-06 school year to multi-subject secondary teachers in rural schools eligible for additional flexibility, and multi-subject special education who are highly qualified in language arts, mathematics, or science at the time of hire.

Montana expects to have limited need for continuing use of HOUSSE given that virtually all of our teachers meet our approved HQT definition. Through the steps outlined below, the OPI generally expects current veteran teachers to receive professional development that will enable them to meet the HQT definition within the coming school year. At the same time, particularly given the relatively unique rural make-up of the state and the continuing need to hire teachers who will be required to teach multiple subjects, we expect to make continuing, limited use of HOUSSE consistent with the NCLB law. We expect that HOUSSE will be used principally for multi-subject special education teachers who were highly qualified at the time of hire in language arts, mathematics, or science to demonstrate competence in other subjects within two years of the date they were hired and for multi-subject secondary teachers in rural areas who were highly qualified in one subject at the time of hire to demonstrate competence in other subjects within three years of hire. However, there may be other limited situations where we will continue to use HOUSSE, such as other cases where a teacher who is highly qualified in one subject must be assigned to teach another subject, or cases where, despite its best efforts to hire only new HQTs, a district must hire a non-HQT to teach a class and that teacher becomes competent in that subject over time.

The Office of Public Instruction is evaluating our HOUSSE process to ensure it is sufficiently rigorous, on a par with the level of content knowledge expectations for new teachers of core academic subjects.

Requirement 6: The revised plan must include a copy of the State's written "equity plan" for ensuring that poor or minority children are not taught by inexperienced, unqualified, or out-of-field teachers at higher rates than are other children.

Montana Equity Plan

Montanans believe "(1) It is the goal of the people to establish a system of education which will develop the full educational potential of each person. Equality of educational opportunity is guaranteed to each person of the state." (The Constitution of the State of Montana, Article X, 1). The Constitution of the State of Montana continues, "(2) the state recognizes the distinct and unique cultural heritage of the American Indians and is committed in its educational goals to the preservation of their cultural integrity."

These provisions of the Constitution of the State of Montana are the foundation of the Montana Equity Plan.

The OPI continues to develop strategies to ensure that all Montana teachers in all Montana core academic classrooms meet the definition for highly qualified teachers. Student achievement among our high-poverty student population remains a significant concern for us. Of the 33 districts not making AYP in school year 2004-05, all but two are high-poverty schools districts and the majority of the students in these districts are American Indians. We consider it vital to ensure that there is no inequitable assignment of teachers to these schools and districts that would only perpetuate these problems.

Goal: To ensure that poor or minority children are taught by experienced, qualified, and properly endorsed teachers on par with other Montana children.

Equitable teacher distribution means, teachers are distributed throughout Montana such that high-poverty, minority or special needs or English language learners are just as likely to be taught by an experienced, highly qualified teacher working in their field as are students who do not fall into those categories.

Experienced means, a teacher with one or more years of successfully teaching in a core academic subject in which the teacher is endorsed.

Montana does not currently have the capacity to collect data on the experience status of Montana teachers. However, the OPI will follow the steps outlined below to address any inequities of distribution of the Montana teaching force as to inexperienced, unqualified and out-of-field teachers. The Montana Office of Public Instruction defines experience as one or more years of successfully teaching in a core academic area in which the teacher is endorsed. Montana will take the following steps to ensure that poor and minority children are not taught at higher rates than other children by inexperienced, unqualified, or out-of-field teachers and Montana OPI will measure, evaluate and publicly report the progress toward meeting equitable distribution of highly qualified teachers.

Equitable Distribution of Experienced Teachers

With specific regard to experienced teachers, our strategy is as follows:

- Step 1. Identify those schools and districts that serve the largest numbers or the highest percentages of Montana's highest-needs, high-poverty, and minority children, in particular, American Indians;
- Step 2. Collect data on the numbers and percentages of teachers (who are experienced and inexperienced) teaching core academic subjects in these schools and districts; and
- Step 3. Target technical assistance and monitoring on those schools in this group that have inexperienced teachers of core academic subjects, with priority with the most intensive technical assistance and monitoring focused on those schools and districts not meeting the adequate year progress or highly qualified teacher goals.

The OPI's technical assistance efforts addressed to equitable distribution of experienced teachers will be integrated with the efforts focused on the equitable distribution of highly qualified and in-field teachers, and will draw upon and involve each of the strategies described below that relate to all of these elements, including the OPI rapid response teams, the school support teams, and internships. The OPI will explore, if appropriate, financial sources to support strategies for recruitment and retention with each district and school, as well as other strategies to attract experienced teachers to these districts and schools.

Specifically, the OPI will:

- 1. Consult with schools and districts identified as not meeting AYP and HQT goals with high-needs and high-poverty status to discuss efforts to increase recruitment and retention efforts of highly qualified and experienced teachers. For example,
 - Educators (superintendents, principals, chairs of boards of trustees) from schools
 and districts in the categories of restructuring and corrective action under the No
 Child Left Behind Act were required by the OPI in October 2006 to attend a twoday conference to receive technical assistance on improving student achievement.
 The two-day conference was titled "Call to Greatness." Part of the discussion
 included strategies to increase recruitment and retention of highly qualified and
 experienced teachers.
 - It was decided at the October 2006 Call to Greatness meeting to meet every six months. Plans have been finalized to hold the next two conferences in February 2007 and August 2007.
- 2. The OPI will identify successful methods, initiatives and strategies to attract experienced and effective teachers to teach in Montana's high-need, high-poverty schools and districts.
 - The OPI will post on its Web site successful methods, initiatives and strategies to attract experienced and effective teachers to teach in Montana's high-need, highpoverty schools and districts.
 - The OPI will survey schools and districts regarding successful recruitment and retention strategies.

- 3. Monitor progress on recruiting and retaining experienced and effective teachers.
 - The OPI will meet biannually with schools and districts identified in the categories of restructuring and corrective action to monitor progress toward meeting the AYP and HQT goals of ensuring effective and experienced teachers.
- 4. Promote effective recruitment and retention methods statewide.
 - The OPI will provide technical assistance, workshops, and other related activities to promote effective recruitment and retention strategies statewide.

Equitable Distribution of Highly Qualified and In-Field Teachers

The following table presents data comparing the numbers and percentages of classes taught by HQT in high- and low-poverty schools.

Montana HQT Data for School Year 2004-05 by School Type

School Type	Total Number of Core Academic Classes	Number of Core Academic Classes Taught by Highly Qualified Teachers	Reported Percentage of Core Academic Classes Taught by Highly Qualified Teachers
All Schools in State	28,147	27,850	98.9%
Elementary/Middle Level			
High Poverty	2,661	2,632	98.9%
Low Poverty	2,097	2,081	99.2%
All Elementary/Middle	14,578	14,466	99.2%
Secondary Level Schools			
High Poverty	1,503	1,457	96.9%
Low Poverty	5,643	5,587	99.0%
All Secondary Schools	13,569	13,384	98.6%

Analysis

The difference of the percentage of classes with HQT between high-poverty and low-poverty elementary and secondary schools is statistically insignificant. That difference increases somewhat, but not significantly, when the distribution of HQT is examined by poverty quartiles for schools and districts in the following charts. The district percentage difference between high-poverty and low-poverty FTE consistent with the HQT definition is 0.395; for the schools, the percentage difference is 0.342. These data provide the Office of Public Instruction with clear direction of where to concentrate our efforts and next steps to reach the goal of 100 percent high quality and effective teachers for the 2006-07 school year and thereafter.

Montana HQT Distribution Data for School Year 2004-05 by Quartiles

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Montana District Quartiles						
	Total FTE	Not HQT FTE	% Not HQT	% HQT		
Quartile 1 - High Poverty						
Schools	1780.383	18.253	1.025%	98.975%		
Quartile 2	3854.641	22.494	0.584%	99.416%		
Quartile 3	3509.893	14.805	0.422%	99.578%		
Quartile 4 - Low Poverty	1047.256	6 604	0.630%	00.2709/		
Schools	1047.356	6.601	0.630%	99.370%		
State Total	10192.273	62.153	0.610%	99.390%		

Montana School Quartiles						
Total FTE Not HQT FTE % Not HQT %HQT						
Quartile 1- High Poverty Schools	1947.065	17.275	0.887%	99.113%		
Quartile 2	2356.701	17.519	0.743%	99.257%		
Quartile 3	3407.580	13.847	0.406%	99.594%		
Quartile 4 – Low Poverty Schools	2480.927	13.512	0.545%	99.455%		
State Total	10192.273	62.153	0.610%	99.390%		

Analysis

Montana's data system, as discussed above, permits us to identify high poverty districts and schools, as well as districts and schools with significant concentrations of American Indians that are falling short of our HQT goal. We focus on these districts and schools, as well as those not making AYP, in reviewing the data. The data indicate that we do not now have a problem of inequitable distribution of teachers who do not meet the HQT definition or are teaching out-of-field.

Strategies

The Montana Office of Public Instruction's goal is to ensure continuing equity in teacher allocations by concentrating the full range of our technical assistance, professional development, and monitoring programs, discussed below and in other sections of this overall plan, on high-

poverty districts and schools and ensuring that these programs also equitably and carefully address the needs of districts and schools with significant concentrations of minority students, in particular American Indians. If significant problems of equity are identified or a pattern of such problems appears to be developing based on an examination of the data we collect, OPI will deploy a rapid response team to work with the negatively affected schools and districts to analyze their particular needs and obstacles and to devise a specific strategy incorporated in the district's improvement plan to address these needs and obstacles, tapping into the full range of technical assistance and professional development programs provided in the state. The OPI team will work intensively with the applicable schools and districts, and with the School Support Team, to package these programs in a way that best meets the needs of the school and district and their teachers. These programs include --

- 1. Technical assistance to schools and districts in developing the improvement plan required by the BPE that includes an analysis of problems and obstacles and provides a step-by-step outline of strategies to solve them. The OPI provides technical assistance to the district and school and monitors their progress. (ARM 10.55.605 Accreditation Categories See Appendix A)
- 2. School Support Teams Whether or not the district or school is designated for corrective action or restructuring, School Support Teams (SST) will be assigned to districts and schools that have inequitable proportions of teachers who are not highly qualified or teaching out-of-field, or inexperienced. The SST will conduct a comprehensive on-site review based on the Correlates and Indicators of Effective Schools Research, and these results will be used by the OPI rapid response team in working with the district and school in developing its improvement plan for meeting the HQT goal.
- 3. Internships Teaching internships for hard-to-fill positions, unexpected openings, or no applicants. The teaching internship program is a three-party arrangement among the teacher, district, and an accredited teacher education program. If a district is unable to fill a position, the district is permitted to assign a teacher on staff to teach an out-of-field core academic subject class, on the condition that the teacher enroll in a Montana institution of higher education's accredited teacher education program in that subject area. (Professional Educator Preparation Program Standards, http://opi.mt.gov/ARM/Index.html). The intern is given a three-year time line to complete the course work necessary for an additional endorsement and meet the HQT definition and the Montana HOUSSE. While teaching in the program, the intern is supervised by the school principal and an HQT in that core academic subject. The OPI provides guidance and technical assistance to the teachers, district personnel and higher education faculty during the three-year internship.

- 4. Mentorships The mentorship institute cosponsored by OPI and its partners provides support to beginning teachers and job-embedded professional development opportunities to help the participating schools and districts identify strategies to reach the 100 percent HQT goal. Such mentorship programs fulfill a two-fold purpose: creating a culture in schools for new teachers that promotes effective teaching and learning and continuous professional growth, thereby enhancing retention of experienced and effective teachers; and helping schools and districts take teachers who do not meet the HQT definition and make them HQT through HOUSSE.
- 5. Regional Professional Development Outreach Content-specific professional development for teachers not meeting the HQT definition, provided through regional education cooperatives and consortia,. In particular, for core academic subjects or areas with the highest percentage of teachers not meeting the HQT definition -- science, special education, and world languages -- the OPI will broker professional development offerings in these areas.
- 6. Regional Teacher Sharing. Sharing the services of properly licensed and endorsed (and experienced) teachers for schools with hard-to-fill positions in core academic subjects among adjoining districts, with a focus on ensuring equity in teacher quality among districts and schools. The OPI is working with the Montana Association of School Superintendents, MEA-MFT, School Administrators of Montana, Montana School Boards Association, Montana Small Schools Alliance and Tribal Education Departments and Councils to expand a regional system to equitably distribute HQT to teach in core academic subjects. Regional HQT "circuit riders" will be able to teach core academic subject classes in two or more school districts.

Through a focused application of these programs on schools and districts that begin to have a teacher quality equity problem, OPI will continue to ensure that any such problems do not develop or persist.

Montana's Revised Plan

Appendix A

Spreadsheets Containing the Not AYP Schools and Districts and the Not HQT



July 7, 2006 Revised October 6, 2006